

# Morgan Lewis

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August 14, 2023

# MEMO ENDORSED

**VIA ECF**

The Honorable Magistrate Judge Barbara C. Moses  
United States District Court, Southern District of New York  
500 Pearl Street, Room 740  
New York, New York 10007

*Re: Leitch et al. v. Amazon Services.Com LLC, Case No.: 22-cv-06121-LGS/BCM*

Dear Judge Moses:

The parties write jointly in accordance with your Honor's August 1, 2023 Order (Dkt. 106) directing the parties to submit (i) their proposed discovery plan, and (ii) a letter updating the Court on the status of the discovery issues outlined in Plaintiffs' June 27, 2023 pre-motion letter to compel (Dkt. 90). The parties have prepared a proposed discovery schedule, attached hereto as Exhibit A. The parties jointly request an extension of time to file the discovery status letter from today until August 23, 2023.

In support of this request, the parties submit that they have agreed to facilitate a discussion between Plaintiffs' computer expert and someone at Amazon knowledgeable about the relevant data in order to narrow the scope of the parties' discovery dispute. Due to scheduling conflicts, the earliest date that discussion can occur is this Friday, August 18. Afterwards, counsel will need to confer again to discuss the parties' respective positions. In the meantime, the parties have scheduled the remaining two plaintiffs' depositions for Monday, August 21, 2023. Accordingly, the parties respectfully request until August 23, 2023 to submit the letter updating the Court on the outstanding discovery issues. This is the parties' third request of this type and there is no prejudice to any party.

Respectfully submitted,

/s/ Sean P. Lynch

Sean P. Lynch

cc: Robert Wisniewski, Esq.

Application GRANTED. The parties shall submit their letter updating the Court on the outstanding discovery issues no later than **August 23, 2023**.  
SO ORDERED.



Barbara Moses  
United States Magistrate Judge  
August 15, 2023

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